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November 25, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080**

Dear Judge Singh:

Pursuant to the Court's directive during the November 12, 2024 case-management conference [ECF No. 326], we write jointly on behalf of the Self-Funded Payer Track Plaintiffs and Defendants to provide the following status update as to the parties' discussions regarding the process to amend earlier-filed complaints and add certain rebate-aggregating entities as defendants:

The parties conferred on Wednesday, November 20, 2024, concerning the process for evaluating SFP Plaintiffs' proposal to amend earlier-filed complaints and to add new defendants. In accordance with Local Civil Rule 15.1, Plaintiffs have agreed to provide Defendants with a proposed amended complaint on or before Tuesday, December 3, 2024. The parties will thereafter meet and confer regarding SFP Plaintiffs' proposal.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

s/ David R. Buchanan
David R. Buchanan
Liaison Counsel for
Self-Funded Payer Track

cc: Counsel of Record (via ECF)